## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

Jerry Michael Puckett,	§	
Andrew Joseph Puckett, and		
George Robert Puckett	8	
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Plaintiffs,	8	
V.	8	
<b>*</b> ·	8	
Unicai County Tonnesson	8	
Unicoi County, Tennessee;	8	
City of Erwin, Tennessee;	§	
Michael Hensley;	<b>§</b>	Case No. 2:23-cv-00123-DCLC
Jonathan "Frank" Rogers;	§	
Tony Buchanan;	§	JURY TRIAL REQUESTED
Ron Arnold;	§	
Chad Ricker;	§	
Claude Hensley;	§	
Brian Tressler;	§	
Robert Bullington;	§	
R. Mitchell Manuel; and	<i>ၹၹၹၹၹၹၹၹၹၹၹၹၹၹၹၹၹၹၹ</i>	
John and Jane Does No. 1-10	§	
	§	
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Defendants.

# PLAINTIFFS' UNOPPOSED MOTION TO TEMPORARILY ABATE SCHEDULING ORDER DEADLINES

Plaintiffs Jerry Michael Puckett, Andrew Joseph Puckett, and George Robert Puckett (collectively "Plaintiffs") file this unopposed motion to request a 30-day abatement of all case deadlines to permit the parties time to discuss a new agreed case schedule in light of Plaintiffs' recent filing of their Third Amended Complaint. Plaintiffs have conferred with counsel for each party that has previously answered and appeared in this case, and all counsel are unopposed to the relief Plaintiffs request in this motion.

Good cause exists for the relief Plaintiffs request in this motion. Plaintiffs Third Amended Complaint was filed on October 30, 2024. The Third Amended Complaint added

Plaintiffs' Unopposed Motion to Temporarily Abate Scheduling Order Deadlines

Page 1

**PageID** 

substantial additional factual allegations based on discovery obtained in this lawsuit to date. The Third Amended Complaint also added six individuals as defendants to this case who previously were not parties to this lawsuit. The Third Amended Complaint also added eight additional causes of action that previously were not asserted in this lawsuit.

Plaintiffs requested issuance of a summons for each of the newly added Defendants on November 1, 2024 and intend to act expeditiously to have each of the new Defendants served with process for the Third Amended Complaint.

Counsel for all parties in this case prior to the filing of the Third Amended Complaint have scheduled a videoconference meeting for November 6, 2024 to begin the process of discussing a revised case schedule in light of the new party defendants added to this case. All currently represented parties are unopposed to a 30-day abatement of current case deadlines to allow the existing parties to discuss a revised case schedule, and to permit Plaintiffs to effectuate service of process for newly-added Defendants. This request would apply to the following case deadlines set to run within the next 30 days:

- Plaintiffs' Expert Disclosure Deadline November 4, 2024; and
- Defendants' Rebuttal Expert Disclosure Deadline November 15, 2024.

Plaintiffs are unopposed to the filing of a joint status report regarding the case schedule and other case issues as the Court may request. Plaintiffs also are unopposed to setting a status conference with the Court should the Court choose to hold one.

Plaintiffs' Unopposed Motion to Temporarily Abate Scheduling Order Deadlines

Page 2

Dated: November 4, 2024

#### Respectfully Submitted,

/s/ Donald Puckett

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Attorneys for Plaintiffs

Jerry Puckett, Andrew Puckett, and George Puckett

#### CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for all parties that previously have answered and appeared in this case (City of Erwin, Unicoi County, Michael Hensley, Jonathan Rogers, and Tony Buchanan), and all such counsel are unopposed to the relief requested in this Motion.

/s/ Donald Puckett

Donald Puckett

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 4, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Donald Puckett
Donald Puckett

Plaintiffs' Unopposed Motion to Temporarily Abate Scheduling Order Deadlines

Page 3

**PageID**